



STOLL · KEENON · OGDEN  
PLLC

2000 PNC PLAZA  
500 WEST JEFFERSON STREET  
LOUISVILLE, KY 40202-2828  
MAIN: (502) 333-6000  
FAX: (502) 333-6099  
www.skofirm.com

**DEBORAH T. EVERSELE**  
DIRECT DIAL: (502) 568-5770  
DIRECT FAX: (502) 333-6099  
Deborah.Eversole@skofirm.com

May 12, 2011

RECEIVED

Jeffrey DeRouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40601

MAY 12 2011

PUBLIC SERVICE  
COMMISSION

***RE: 2009-00110 Petition Of Nexus Communications, Inc. For Additional Designation  
As An Eligible Telecommunications Carrier In Kentucky***

Dear Mr. DeRouen:

Enclosed for filing please find an original and ten copies of the Motion of Nexus Communications, Inc. for Extension of Time to Respond to Commission Staff's Third Request for Information. Also enclosed are copies of Kentucky State Bar Association ("KBA") Out-of-State Certification Request Forms for Danielle Frappier and Christopher Fedeli, who are now co-counsel to Nexus in this case. These forms have been submitted to the KBA, together with the required fees. Upon receipt of the KBA's receipt/letters confirming, copies of those letters will be filed with the Commission.

Please return the additional copy of the Motion with your file stamp to me via our runner.

Sincerely yours,

Deborah T. Eversole

DTE: jms  
Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED  
MAY 12 2011  
PUBLIC SERVICE  
COMMISSION

Petition of Nexus Communications, Inc. for  
Additional Designation as an Eligible  
Telecommunications Carrier in Kentucky

Case No. 2009-00110

**MOTION OF NEXUS COMMUNICATIONS, INC. FOR EXTENSION OF TIME TO  
RESPOND TO COMMISSION STAFF'S THIRD REQUEST FOR INFORMATION**

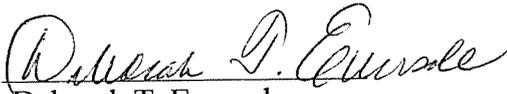
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Nexus Communications, Inc. ("Nexus"), by counsel, hereby moves the Commission to extend, to June 16, 2011, the date upon which its responses to the Kentucky Public Service Commission ("Commission") Staff's Third Request for Information are due.

As grounds for its motion, Nexus states that it is working diligently to compile answers to the fifty-nine (59) data requests sought by Staff, but does not anticipate that the work will be complete by the current due date of May 16, 2011. Nexus currently has over a dozen proceedings pending before both the Federal Communications Commission and other State Public Service Commissions, each with deadlines and demands that need to be given equal priority to that of the Commission in the instant proceeding. Nexus further states that, as there are no other parties to this proceeding, there will be no prejudice to anyone by granting Nexus the extension it seeks. For the foregoing reasons, Nexus respectfully requests that the due date for its responses be extended to June 16, 2011.

Respectfully submitted,

Danielle Frappier  
Chris Fedeli  
DAVIS WRIGHT TREMAINE LLP  
1919 Pennsylvania Ave. NW  
Suite 800  
Washington, DC 20006-3401  
Phone: (202) 973-4242

  
Deborah T. Eversole  
Douglas F. Brent  
STOLL KEENON OGDEN PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202-2828  
Phone: (502) 333-6000

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*Counsel for Nexus Communications, Inc.*

May 12, 2011



KENTUCKY BAR ASSOCIATION
OUT-OF-STATE CERTIFICATION REQUEST FORM



PLEASE PROVIDE THIS OFFICE WITH THE FOLLOWING INFORMATION:

NAME: Danielle M. Frappier (PLEASE PRINT)

DATE OF BIRTH: 01/28/1974

ADDRESS TO BE USED FOR KBA RECORDS: Davis Wright Tremaine LLP, 1919 Pennsylvania Avenue, NW - Suite 800, Washington, DC 20006

TELEPHONE NUMBER: (Please indicate if this is a business or home telephone number) 202 973 4242 Home Business

FAX NUMBER: 202 973 4499

E-MAIL ADDRESS: daniellefrappier@dwt.com

STATE BARS OF WHICH YOU ARE A MEMBER IN GOOD STANDING: (Please include membership number) DC - 472919

KY COURT AND CASE NUMBER FOR WHICH YOU SEEK CERTIFICATION: Commonwealth of Kentucky Public Service Commission - 2009-00110 (REQUIRED)

KENTUCKY CO-COUNSEL / BAR #: Douglas F. Brent, 81761 (REQUIRED)

Since January 1, 2005, have you practiced a case in Kentucky under SCR 3.030? YES NO

SCR 3.030 Membership, practice by nonmembers and classes of membership (2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee

I have read and agree to comply with the requirements set forth in SCR 3.030(2), including submitting to the Rules of Professional Conduct of The Kentucky Supreme Court.

I certify by signing this form that I am a member in good standing in my state(s) of licensure, and that the information provided by me on this form is true and correct.

Danielle Frappier SIGNATURE

Notary Seal: (Required)

DISTRICT OF COLUMBIA

STATE OF COUNTY OF

Acknowledged, subscribed & sworn to by Danielle Frappier (Attorney's Name) who personally appeared before me on the 10th day of May, 2011.

NOTARY PUBLIC My Commission expires:

Nicheta Y. Alice Notary Public, District of Columbia My Commission Expires 6/30/2015

RETURN ORIGINAL FORM TO: KENTUCKY BAR ASSOCIATION ATTN: MEMBERSHIP DEPARTMENT 514 W MAIN ST FRANKFORT KY 40601-1812 Phone (502)564-3795

Revised 01/08/08



KENTUCKY BAR ASSOCIATION
OUT-OF-STATE CERTIFICATION REQUEST FORM



PLEASE PROVIDE THIS OFFICE WITH THE FOLLOWING INFORMATION:

NAME: Christopher A. Fedeli (PLEASE PRINT)

DATE OF BIRTH: 01/13/1974

ADDRESS TO BE USED FOR KBA RECORDS: Davis Wright Tremaine LLP, 1919 Pennsylvania Avenue, NW - Suite 800, Washington, DC 20006

TELEPHONE NUMBER: (Please indicate if this is a business or home telephone number) 202 973 4274 Home Business

FAX NUMBER: 202 973 4499

E-MAIL ADDRESS: chrisfedeli@dwt.com

STATE BARS OF WHICH YOU ARE A MEMBER IN GOOD STANDING: (Please include membership number) DC - 472919

KY COURT AND CASE NUMBER FOR WHICH YOU SEEK CERTIFICATION: Commonwealth of Kentucky Public Service Commission - 2009-00110 (REQUIRED)

KENTUCKY CO-COUNSEL / BAR #: Douglas F. Brent, 81761 (REQUIRED)

Since January 1, 2005, have you practiced a case in Kentucky under SCR 3.030? YES NO

SCR 3.030 Membership, practice by nonmembers and classes of membership

(2) A person admitted to practice in another state, but not in this state, shall be permitted to practice a case in this state only if that attorney subjects himself or herself to the jurisdiction and rules of the court governing professional conduct, pays a per case fee of \$100.00 to the Kentucky Bar Association and engages a member of the association as co-counsel, whose presence shall be necessary at all trials and at other times when required by the court. No motion for permission to practice in any state court in this jurisdiction shall be granted without submission to the admitting court of a certification from the Kentucky Bar Association of receipt of this fee.



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I certify by signing this form that I am a member in good standing in my state(s) of licensure, and that the information provided by me on this form is true and correct.

SIGNATURE

Notary Seal: (Required)

DISTRICT OF COLUMBIA

STATE OF DISTRICT OF COLUMBIA COUNTY OF DISTRICT OF COLUMBIA

Acknowledged, subscribed & sworn to by Christopher A. Fedeli (Attorney's Name) who personally appeared before me on the 10th day of May, 2011.

NOTARY PUBLIC

My Commission expires:

Nichele Y. Rice Notary Public, District of Columbia My Commission Expires 6/30/2015

RETURN ORIGINAL FORM TO: KENTUCKY BAR ASSOCIATION ATTN: MEMBERSHIP DEPARTMENT 514 W MAIN ST FRANKFORT KY 40601-1812 Phone (502)564-3795

Revised 01/08/08